

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|------------------------------------|---|--|
| IRENE SIMMONS AND RODELL |) | |
| SANDERS, for themselves and others |) | Case No. 1:20-CV-1128 |
| similarly situated, |) | |
| |) | |
| Plaintiffs, |) | Judge John J. Tharp Jr. |
| |) | |
| v. |) | Magistrate Judge Jeannice W. Appenteng |
| |) | |
| MOTOROLA SOLUTIONS, INC., and |) | |
| VIGILANT SOLUTIONS, LLC, |) | |
| |) | |
| Defendants. |) | |

JOINT STATUS REPORT

Under the Court's July 29, 2024 Minute Entry (Dkt. 161), Plaintiffs Irene Simmons and Rodell Sanders and Defendants Motorola Solutions, Inc. and Vigilant Solutions, LLC, through their respective counsel, respectfully submit this joint status report.

The Parties continue to move toward finalizing documentation of their settlement and anticipate executing the settlement agreement by September 13, 2024. Accordingly, the Parties respectfully propose that the Court set a deadline of September 30, 2024 for the Parties to file a joint status report further updating the Court on settlement agreement execution and engagement of a Settlement Administrator. The Parties also respectfully request that the Court continue to stay ruling on Defendants' pending motion for summary judgment (Dkt. 111) in the meantime.

[Signature page follows]

DATED: August 30, 2024

PLAINTIFFS IRENE SIMMONS and
RODELL SANDERS

/s/ Michael I. Kanovitz
One of their attorneys

Jonathan I. Loevy
Michael I. Kanovitz
LOEVY & LOEVY
311 N. Aberdeen, 3rd Floor
Chicago, Illinois 60607
312.243.5900
jon@loevy.com
mike@loevy.com
Counsel for Plaintiffs

Respectfully submitted,

DEFENDANTS MOTOROLA SOLUTIONS,
INC. and VIGILANT SOLUTIONS, LLC

/s/ David C. Layden
One of their attorneys

David C. Layden
Andrew W. Vail
JENNER & BLOCK LLP
353 North Clark Street
Chicago, Illinois 60654-3456
(312) 222-9350
dlayden@jenner.com
avail@jenner.com
Counsel for Defendants